

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In Re:

Case No. 24-30760
Chapter 7

Minnesota Implant Center P.L.L.C.,

Debtor.

**APPLICATION FOR APPROVAL OF
COUNSEL: RECOMMENDATION AND ORDER**

1. Applicant is the trustee in this case.
2. Applicant believes that the employment of counsel is necessary to represent or assist the trustee in carrying out the trustee's duties as follows: To represent the trustee in connection with a motion for turnover, several bankruptcy rule 2004 examinations and in connection with avoidance claims.
3. Manty & Associates, P.A. is qualified by reason of practice and experience to render such representation or assistance.
4. Manty & Associates has agreed to perform services as counsel on an hourly fee plus costs basis. Fees and costs shall be subject to court review and approval. However, Manty & Associates may reimburse itself for out-of-pocket expenses, including, but not limited to, serving creditors and parties in interest with various pleadings and notices without prior court approval. The payment of the out-of-pocket expenses will be subject to final court approval and disgorgement in the fee application process. The employment shall be effective as of April 11, 2024.
5. Manty & Associates will calculate its fees for professional services in accordance with agreed-upon hourly rates for these services, as such rates are subject to adjustment from time to time, for inflation and other factors. The current compensation range for attorneys working on these matters is \$400.00 to \$580.00, and \$160.00 to \$210.00 for paralegal assistance. Manty & Associates adjusts its rates periodically, generally on January 1 of each year.
6. In connection with the reimbursement of actual, necessary expenses, Manty & Associates has advised the trustee that it charges expenses, including long-distance telephone, facsimile charges, U.S. Mail and overnight mail charges, photocopying charges, computerized research, transcription costs, travel and lodging costs, advancing costs that are necessary in the administration of the case and court filing fees.
7. To the best of the trustee's knowledge, information and belief, and except as set forth in the Verified Statement, Manty & Associates has disclosed to the undersigned that it does not

represent any creditors in connection with the chapter 7 case, and is disinterested within the meaning of 11 U.S.C. §§ 327(a), 328 and Fed. R. Bankr. P. 2014. Manty & Associates does not have any connection with the debtor, their estates or any party in interest, their representatives, attorneys and accountants, the United States Trustee for Region 12 or any person employed with the Office of the United States Trustee for Region 12, except that Nauni Manty of Manty & Associates, is a Chapter 7 trustee on the panel in the District of Minnesota and has been and is appointed by the United States Trustee in other unrelated matters.

8. The trustee has made the following efforts to recover the asset prior to submitting this application: The trustee requested that the debtor provide loan documents, so she can verify any secured interest in personal property of the debtor. The debtor does not have the records. The trustee also attempted to call the various scheduled secured creditors to obtain the loan documents and some such creditors have not responded. The trustee must conduct a motion for turnover to obtain the loan documents. The trustee must also file a motion for authorization to conduct an examination under bankruptcy rule 2004 to obtain bank records and business records of the debtor.

WHEREFORE, applicant prays that the court approve such employment by the trustee.

Dated: April 11, 2024

s/ Nauni Manty

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